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EBusiness Success, Inc., Elite Debit, Inc. Funding Success, Inc., Hooper Processing, Inc.
I Works, Inc., Internet Economy, Inc. Internet Fitness, Inc., Market Funding Solutions, Inc.
Money Harvest, Inc., Monroe Processing, Inc. Net Commerce, Inc., Premier Performance, Inc.
Pro Internet Services, Inc., Revive Marketing, Inc. Success Marketing, Inc., Summit Processing, Inc.
Tran Voyage, Inc., TranFirst, Inc., Unlimited Processing, Inc., and eCom Success, Inc.*

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

FEDERAL TRADE COMMISSION,

Plaintiff(s),

v.

JEREMY JOHNSON, et al.

Defendant(s).

Case No.: 2:10-cv-2203-MMD-GWF

**STIPULATED MOTION TO TAKE THE DEPOSITION
OF JEREMY JOHNSON ON SEPTEMBER 5, 2013**

1 By this stipulated motion, the parties move the Court to allow them to take the
 2 deposition of Jeremy Johnson on September 5, 2013. This date is beyond the regular fact
 3 discovery deadline. However, availability issues regarding counsel have arisen that the parties
 4 have been unable to work around. Pursuant to a previous order of Judge Du, the parties were
 5 permitted to take another deposition (Scott Leavitt) by the end of August. However, Mr.
 6 Leavitt's counsel is unavailable during the last week of August. He, therefore, requested that
 7 the FTC agree to depose Mr. Leavitt on September 6. The FTC noted to Mr. Leavitt's counsel
 8 that it could not justify separate trips for Mr. Leavitt and Mr. Johnson's depositions. Thus, the
 9 FTC conditioned agreeing to stipulate to depose Mr. Leavitt on September 6 on Mr. Johnson's
 10 depositions being held on September 5. IWorks has no objection to this schedule, and agrees
 11 that it would be convenient for all parties to have the deposition of Mr. Johnson taken at around
 12 the same time.

13
 14
 15 DATED this 9th day of August, 2013.

16 **CHRISTENSEN & JENSEN, P.C.**

17 /s/ Karra J. Porter

18 Karra J. Porter

19 Kelly H. Macfarlane

20 Phillip E. Lowry, Jr.

21 Sarah E. Spencer

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28 *Inc. Funding Success, Inc., Hooper Processing, Inc., I Works,*

Inc., Internet Economy, Inc. Internet Fitness, Inc., Market

Funding Solutions, Inc., Money Harvest, Inc., Monroe

Processing, Inc. Net Commerce, Inc., Premier Performance,

Inc., Pro Internet Services, Inc., Revive Marketing, Inc. Success

Marketing, Inc., Summit Processing, Inc., Tran Voyage, Inc.,

TranFirst, Inc., Unlimited Processing, Inc., and eCom Success,

Inc.

1
2 DATED this 9th day of August, 2013.

3 /s/ Collot Guerard

4 Collot Guerard

5 J. Ronald Brooke, Jr.

6 Janice L. Kopec

7 Dotan Weinman

8 *Attorneys for Federal Trade Commission*

9 *(signed with permission)*

10 **IT IS SO ORDERED:**

11 

12 GEORGE FOLEY, JR.

13 United States Magistrate Judge

14 DATED: August 12, 2013